

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

BRIAN J. SCHELL,)	
)	
Plaintiff,)	
)	
VS.)	NO. 3:19-cv-1326-JPG
)	
ERIC SCHELLHARDT,)	
MARC ASBURY,)	and
MADISON COUNTY,)	

PLAINTIFF'S RULE 26(2) EXPERT WITNESS DISCLOSURE

NOW COMES the plaintiff, BRIAN J. SCHELL, by and through his attorneys, Polinske & Associates, P.C., and Brian L. Polinske, and discloses the following witness will testify at trial pursuant to Federal Rules of Evidence 701, 703 or 705 in this matter as a retained expert witness:

Dr. John C. Navin, Phd, 63 Anna Circle, Bluffton, OH 45817

Pursuant to Rule 26(2) the witnesses' written report prepared and signed by Dr. Navin is attached hereto (See Schell Bates 918 to 1132). The report contains a complete statement of all opinions the witness will express and the basis and reasons for them; (ii) the facts or data considered by the witness in forming them; (iii) any exhibits that will be used to summarize or support them; (iv) the witnesses' qualifications, including a list of all publications authored in the previous 10 years; (v) a lists of other cases in which, during the previous 4 years, the witness testified as an expert at trial or by deposition; and (vi) a statement of the compensation to be paid for the study and testimony in the case.

See attached Bates numbered Schell 918 to 1132.

Respectfully submitted,
Polinske & Associates, P.C.,

/s Brian L. Polinske

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on January 13, 2021, a copy of this pleading was served upon all parties of record via ECF and upon the following parties:

Heidi L. Eckert
7777 Bonhomme Avenue, Ste. 1800
St. Louis, MO 63105

/s Brian L. Polinske